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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JAMES D. JUDAH**

1 I, James DuBois Judah, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. On June 22, 2017, I participated in a meet and confer with Special Master Cooper  
7 and counsel for Defendants. Among other topics, the parties discussed discovery limits, and in  
8 particular whether Defendant Otto Trucking was entitled to serve 25 of its own interrogatories, or  
9 whether Defendants collectively were limited to 25 interrogatories. Special Master Cooper  
10 offered his view that under the language of Rule 33, each party was entitled to 25 interrogatories.  
11 I have no recollection or contemporaneous notes of Special Master Cooper issuing a ruling on the  
12 issue of whether Uber and Ottomotto were considered a single party or two parties for purposes of  
13 Rule 33, or issuing a ruling that Uber and Ottomotto could each serve 25 interrogatories on  
14 Waymo.

15 3. I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct.

17 DATED: August 9, 2017

18 /s/ James D. Judah  
James D. Judah

19  
20 **SIGNATURE ATTESTATION**

21 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
22 filing of this document has been obtained from James D. Judah.

23  
24 /s/ Charles K. Verhoeven  
Charles K. Verhoeven